

BRACEWELL

September 27, 2022

BY ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *In re: Search Warrants dated November 3 and 5, 2021,*
Nos. 21 Misc. 813, 21 Misc. 819 and 21 Misc. 825 (AT)

Dear Judge Torres:

Pursuant to the Court's Order, dated February 18, 2022 ("Order"), I am submitting for the Court's review the August 2022 invoice setting forth the fees, expenses, and costs incurred by me and my firm in connection with my role as Special Master in the above-referenced matters.

I have shared this invoice with the parties prior to submittal and provided them an opportunity to object or ask questions. No objections were received. Accordingly, I respectfully request that the Court approve this invoice and direct the parties to pay the amount set forth therein in accordance with the Order.

As always, I am happy to answer any questions the Court may have or provide additional information if necessary.

Respectfully submitted,

/s/ Barbara S. Jones

Barbara S. Jones

Attachment

cc: Counsel for all parties

Barbara S. Jones
Partner

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United States District Court, Southern District of New York (Veritas)
 500 Pearl Street
 New York, NY 10007

September 09, 2022
 Invoice: 21941630

Our Matter: 0004730.000001 Special Master in Matters of Search Warrants regarding
 Project Veritas
 For Services Through August 31, 2022

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Confer with R. Maxwell and D. Shargel; review for privilege.	1.00	950.00
08/01/22	Review materials and draft report and recommendation.	2.50	2,250.00
08/01/22	Review objections	2.30	2,185.00
08/02/22	Privilege review.	4.00	3,800.00
08/02/22	Review materials and draft report and recommendation.	4.90	4,410.00
08/02/22	Review party objections	2.50	2,375.00
08/03/22	Confer with R. Maxwell on legal analysis for review of documents.	1.30	1,235.00
08/03/22	Legal Research	1.80	1,080.00
08/03/22	Review materials and draft report and recommendation.	5.00	4,500.00
08/03/22	Conference re: objections and next steps	0.50	475.00
08/04/22	Legal Research	4.90	2,940.00
08/04/22	Review materials and draft report and recommendation.	2.20	1,980.00
08/04/22	Attention to technical issues	1.30	1,235.00
08/05/22	Internal meeting	1.00	600.00

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Page 2

Client: United States District Court, Southern District of New York (Veritas)

Invoice: 21941630

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/05/22	Attention to technical issues re: photos etc	1.50	1,425.00
08/08/22	Call with J. Jones; review of provided materials	1.50	1,425.00
08/08/22	Resolve photo issues	4.30	2,580.00
08/08/22	Attention to technical issues; email correspondence with party	1.00	950.00
08/09/22	Draft Report and Recommendation.	0.60	540.00
08/10/22	conf with J. Jones; review of filed materials	2.10	1,995.00
08/10/22	Resolve photo issues	5.20	3,120.00
08/10/22	Review documents and draft Report and Recommendation.	3.10	2,790.00
08/11/22	Resolve photo issues	4.30	2,580.00
08/11/22	Review materials and draft Report and Recommendation.	1.30	1,170.00
08/16/22	Draft Report and Recommendation	0.90	810.00
08/16/22	Review photo replacements; retrieve additional photos; correspondence with parties	3.60	3,420.00
08/17/22	Draft Report and Recommendation.	2.40	2,160.00
08/17/22	Conference re R&R; attention to objections	0.80	760.00
08/18/22	Draft Report and Recommendation.	2.40	2,160.00
08/19/22	Legal Research	1.30	780.00
08/19/22	Review draft report and recommendation; email correspondence re same	1.00	950.00

BRACEWELL

Page 3

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<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/22/22	Conf with J. Jones; review of findings and submissions	1.60	1,520.00
08/22/22	Assist w/research for R&R	0.70	420.00
08/22/22	Attention to R&R and objections	1.30	1,235.00
08/24/22	Review R&R and send draft to Judge Jones.	0.30	270.00
08/25/22	Review materials.	1.00	900.00
08/25/22	Review objections; attention to various	1.30	1,235.00
08/26/22	Attention to objections and Report	2.50	2,375.00
08/29/22	Conference with Judge Jones	0.30	285.00
08/30/22	Review draft R&R.	1.00	950.00
Total Fees			\$ 68,820.00

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Page 4

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Expense Detail

<u>Date</u>	<u>Cost</u>	<u>Description</u>	<u>Amount</u>
08/31/22	Document Production	Complete Discovery Source - Vendor: Complete Discovery Source - Monthly Data Hosting, Monthly User License, Project Management Inv# INV-CDS-25281 Date: 08/31/2022	5,548.19
Total Expenses			\$ 5,548.19
Total Fees, Expenses and Charges on This Invoice			\$ 74,368.19
Government's 50% share: \$37,184.10 Petitioners' 50% share: \$37,184.09			